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United States District Court  
Eastern District of New York

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Roxanne Slow, )  
                    )  
                    )  
                    Plaintiff, )  
                    )  
                    )  
- against -         )         No. 08 cv 4425 (DGT) (SMG)  
                    )  
                    )  
Prestige Merchandising Company, Inc.     )  
a/k/a Prestige Merchandising Co.,         )  
Wilson Perez, and The Kirby Company,     )  
                    )  
                    Defendants. )  
                    )  
                    )

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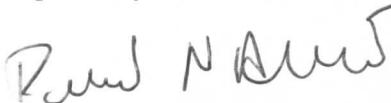
**Statement Pursuant to Local Rule 56.1**

Pursuant to Local Rule 56.1 of the Southern District of New York, Plaintiff Slow ("Ms. Slow") respectfully responds as follows:

1. Paragraphs 1 and 2 do not require any response as they are not statements of facts and do not contain citations to the record.
3. Denied. *See* Slow Deposition, 44.21.
4. Plaintiff admits that she complained to Defendant Wilson Perez about a co-worker harassing her and otherwise denies Paragraph 4. *See* Slow Deposition 44.19-44.24; Declaration of Roxanne Slow ("Slow Decl.") Para. 12.
5. Admitted for purposes of the motion.
6. Denied. Slow Decl. Para. 12; Slow Deposition, 30-31.
7. Admitted for purposes of the motion.
8. Denied. Slow Decl. Para. 12; Slow Deposition, 30-31.
9. Denied. Slow Decl. Para. 13.

10. Denied insofar as Ms. Slow was fired. Slow Decl. Para. 12, Slow Deposition, 30-31.
11. Denied, except that Ms. Slow admits for purposes of the motion that she never filed a formal complaint against the Defendants prior to the one in this matter. Slow Decl. Para. 8.
12. Denied. Slow Decl. Para. 2-12.
13. Ms. Slow admits that she had managerial duties with the ability to hire and fire after her promotion to canvas manager in 2007 and otherwise denies Paragraph 13. Slow Decl. Para. 3,5.
14. Admitted for purposes of the motion.
15. Denied.

Respectfully submitted,



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Dated: New York, NY  
March 1, 2010